



**PUBLIC WORKS AGENCY  
TRANSPORTATION DEPARTMENT  
Traffic, Advance Planning & Permits Division  
MEMORANDUM**

**DATE:** November 30, 2004

**TO:** Resource Management Agency, Planning Division  
Attention: Carl Morehouse

**FROM:** Nazir Lalani, Deputy Director *NL*

**SUBJECT:** Review of Document 04-095  
Draft Environmental Impact Report for the Cabrillo Port Liquefied Natural Gas (LNG) Deep Water Port  
Floating storage and degasification unit moored 14 miles offshore of Ventura County in federal waters and delivered onshore via two 21.1 mile, 24" diameter natural gas pipeline laid on the ocean floor.  
Applicant: BHP Billiton LNG International Inc.  
300 Esplanade Suite 1800, Oxnard  
Lead Agencies: **The United States Coast Guard, Maritime Administration and  
The California State Lands Commission**

The Transportation Department has reviewed the subject EIR for the LNG Deepwater Port Project. The project is the construction of a floating storage and degasification unit moored 14 miles offshore of Ventura County in federal waters and delivered onshore via two 21.1 mile, 24" diameter natural gas pipeline laid on the ocean floor. These pipelines come on shore at Ormond Beach near Oxnard to connect to proposed new onshore pipelines to the existing southern California Gas Company intrastate pipelines system. The proposed 36" underground pipeline in Ventura County will be 14.3 miles long starting at a new metering station within the Reliant Energy Ormond Beach Generation Station and terminating at the Center Road Valve Station. Our comments are as follows:

1. The proposed Center Road Pipeline route will have project specific impacts on several of Ventura County roadways, including Hueneme Road, Nauman Road, Etting Road, Hailes Road, Pleasant Valley Road, Beardsley Road, Santa Clara Avenue, La Vista Avenue, Center Road and possibly other County roads. The amount of construction related trips generated by this project would reduce the life expectancy of the AC pavement on these roads. This will make the need for pavement resurfacing and rehabilitation improvement occurs much sooner than normally scheduled. Therefore, the permittee is required to pay the improvement fees corresponding to the amount of traffic contributed by this project. The permittee shall deposit the required amount into a trust fund with the County of Ventura.
2. The applicant shall reconstruct any damaged or defaced asphalt concrete paving, and/or driveway that is damaged from traffic generated by this project per County Standards. Prior to commencing construction, the applicant will videotape the existing roadway impacted by

L015-18  
Thank you for the information.

L015-19  
Section 4.17.4 discusses this topic.

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L015-19

this project. The videotape prepared and submitted by the applicant shall be used in conjunction with complete inspection after construction to determine if any of the existing surface improvements were damaged by construction trips.

3. This project has the potential to develop traffic on SR 118. Additional traffic to SR 118 in the Somis area may be inconsistent with County General Plan Policy 4.2.2.4(b). In accordance with the County's policy, the project proponent is required to demonstrate that there will be no significant traffic impact to SR 118.

To mitigate the adverse impact of this project on SR 118 to Less than Significant, all project related trips, including employee and construction related trips on SR 118 shall be restricted during peak hours between 6:30 a.m. to 9:a.m and between 3:30 p.m. to 6:30 p.m., Monday through Friday.

4. The cumulative impact of this project when considered with the cumulative impact of all other approved (or anticipated) development projects in the County is potentially significant. The mitigation measures in the executive summary of the EIR should include the condition for paying the County Traffic Impact Mitigation Fee to address the cumulative impacts of this project on the County Regional Road Network. Based on the information provided and the reciprocal agreement between the City of Oxnard and the County of Ventura, the TIMF due to the County is:

$$764 \text{ ADT} * X \$30.58 / \text{ADT} = \underline{\$23,363.12}$$

$$* 120 \text{ construction work force} + 262 \text{ truck trips} X 2 = 764 \text{ ADT}$$

The above estimated fee may be subject to adjustment at the time of deposit, due to provisions in the Traffic Impact Mitigation Ordinance allowing the Fee to be adjusted for inflation based on the Engineering News Record (ENR) construction cost index. The above is an estimate only based on information provided in the draft environmental document. If the project cumulative impacts are not mitigated by payment of a traffic mitigation fee, current General Plan policy will require County opposition to this project.

5. All construction within County right of way shall conform to County Road Standards. Installation of pipe, trenching and backfill within the County right of way shall be in accordance with Section 306 of the "Greenbook" Standard Specifications for Public Works Construction.

6. The project pipeline will be along, adjacent to or crossing several roads overlaid within the last 5 year. According to the County policy, trenching shall not be permitted on any street that was rehabilitated within the last 5 years, unless a full width overlay is provided after trenching is completed. The project proponent shall repair any damage to these roadway, due to the traffic generated by this project up to and including providing a new overlay as determined by the Ventura County Transportation Department.

7. This project will require an encroachment permit from the Transportation Department for work done within the road right of way. The applicant shall contact (805) 654-2055 for requirements of this permit. A separate permit will be required for each jurisdiction in which

L015-20

The text in Section 4.17.4 has been revised in response to the comment.

L015-21

See the response to Comment L015-15.

L015-22

Section 4.17.2 contains additional information on this topic. The Applicant would be required to adhere to all local, state, or Federal laws and regulations in the execution of all parts of this Project.

L015-23

See the response to Comment L015-15.

L015-24

See the response to Comment L015-15.

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work is accomplished. This includes potentially the cities of Oxnard, Port Hueneme and Camarillo as well as Caltrans and the County. Our comments only apply to work in the unincorporated area of Ventura County, and to a potential County road right of way encroachment permit.

8. The permittee shall ensure that access to all local residents is maintained at all times - before, during and after construction. **L015-25**

9. Traffic control will be essential. The traffic control plan must be prepared by a registered engineer and in accordance with the Caltrans traffic manual. Safety of the motoring public and construction workers must be the primary objective, interruption of normal traffic patterns, emergency vehicle response, peak hour traffic impacts, etc. must be minimized. In general, for the preliminary routes proposed, we would require that two-way traffic be maintained at all times, that delays be minimized, and that appropriate signage and flaggers be provided as necessary. **L015-26**

Notification to the public during construction is essential. By this we mean, large electronic monitoring signs, notification to residents impacted, detour signs posted appropriately (and modified as conditions change), notifications to schools, emergency service providers as necessary, and having an informational phone number manned during business hours.

10. On a project of this size, the applicant will be required to fund (during construction in the public right of way) at least one full time inspection position for the duration of the work plus one month. The inspector will be selected by and employed by the County. **L015-27**

This person will not inspect pipeline work, but will primarily be responsible to monitor contractor compliance with traffic control, work hours and road restoration conditions.

11. Liquidated damages deposits are critical on large pipeline projects to ensure that the construction contractor will abide by the plans and specification and restore the roadway to full capacity and usability within the specified time frames. Applicant will be required to pay such a deposit which will be based on the value of the work performed in County road right of way. **L015-28**

12. There is a strong potential for conflicts with other existing or short time utility line improvements, depending on the exact pipeline route selected. The detailed design phase should coordinate with other utility service providers to ensure that conflicts with other utilities are minimized. **L015-29**

13. Access points for any maintenance facilities should be designated to minimize conflicts, i.e., driveways for any maintenance yards, valve pits, pressure-reducing stations, etc. Fixed objects (such as pressure reducing stations) within 20 feet of the edge of the travel way should be avoided. **L015-30**

Our review of this project is limited to the impacts this project may have on the County's Regional Road Network.

Please call me at 654-2080 if you have any questions.

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L015-25

The text in Sections 4.17.1 and 4.17.4 has been revised in response to the comment.

L015-26

The traffic control plan would meet CalTrans requirements.

L015-27

See the response to L015-24.

L015-28

See the response to L015-24.

L015-29

MM LU-2c requires the Applicant to coordinate with utilities in order to minimize conflicts during construction.

L015-30

The design, construction, and operation of natural gas facilities are highly regulated; the U.S. Department of Transportation's Pipeline and Hazardous Materials Safety Administration and the California Public Utilities Commission's Division of Safety and Reliability have jurisdiction over pipelines. Section 4.2.8 discusses the background, regulations, impacts, and mitigation measures for natural gas pipelines. Section 4.2.8.4 describes Project-specific valve spacing and design requirements.



# VENTURA COUNTY SHERIFF'S DEPARTMENT

800 SOUTH VICTORIA AVENUE, VENTURA, CA 93009 PHONE (805) 654-2380 FAX (805) 645-1391

DEC 10 '04 10:46

• BOB BROOKS  
SHERIFF  
• CRAIG HUSBAND  
UNDERSHERIFF

December 10, 2004

Tom Berg, Director  
County of Ventura  
Resource Management Agency  
800 S. Victoria Avenue  
Ventura, California 93009-1740

**Subject:** Draft Environmental Impact Statement (EIS) & Environmental Impact Report (EIR) for the Cabrillo Port Liquefied Natural Gas (LNG) Deepwater Port Project/ RMA Reference Number 04-095

Dear Mr. Berg:

My staff from the Ventura County Sheriff's Department Patrol Services Division and the Office of Emergency Services have reviewed the above-mentioned EIS and EIR for the purpose of assessing the potential impact of this project on emergency services, public safety and disaster response planning. The following comments and considerations are being submitted to you for inclusion into your response back to the lead federal agencies responsible for overseeing this project.

## Recommendations

1. We recommend the exclusionary zone be increased (and clearly marked on charts) to two nautical miles to increase time for interception of unauthorized approach, to ease chart corrections and to facilitate mariner recognition of the exclusionary area (currently recommended at the limit of explosive effect). **L015-31**
2. We recommend that all above the ground facilities and other exposures on land are protected and secured from potential traffic hazards, vandalism and any intentional acts of terrorism. **L015-32**
3. We recommend that local first responders have the opportunity to train and exercise with port facility personnel. **L015-33**

L015-31

Sections 2.2.4, 4.3.1.4, and 4.3.4 address the size of the safety zone, how it would be established, and the potential impacts on marine traffic. The FSRU would be able to rotate 360° around the mooring turret. The safety zone would extend 500 m from the circle formed by the FSRU's stern, the outer edge of the facility, rotating around the mooring turret. See Figure 4.3-4 for an illustration of the potential safety zone and area to be avoided. The safety zone could not be made any larger because its size is governed by international law.

L015-32

The onshore aboveground structures would be fenced.

L015-33

Comment noted.

Questions

1. Could either a blast or Rapid Phase Transition generate a damaging wave? If so, to what degree? **L015-34**
2. Currently, the U.S. Coast Guard, Captain of the Port Los Angeles/Long Beach requires that Sea Marshals board LPG and other High Interest Vessels prior to port entry. LPG Vessels are also escorted in and out of port by at least two law enforcement vessels (USCG and/or LAPD), and a law enforcement vessel monitors the ship 24/7 while in port. Does the USCG intend this same procedure for the LNG facility? Does the USCG anticipate using local law enforcement to assist as is done in LA/LB? **L015-35**
3. What methods and approaches will you utilize for educating the public on emergency preparedness measures and potential pipeline and/or facility failures? Will this education involve the Sheriff's Office of Emergency Services and to what extent? **L015-36**

L015-34

Section 4.2.7.5 and the Independent Risk Assessment (Appendix C) discuss the potential impacts of the analyzed scenarios. A damaging wave is not anticipated for any of the impact scenarios.

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Section 4.2.7.3 and Appendix C3-2 contain information on LNG carrier security.

L015-36

Table 4.2-14 in Section 4.2.8.2 contains information on the requirements of 49 CFR 192 regarding emergency planning and public education programs.

If members of my staff can answer any questions please do not hesitate to contact Laura Hernandez of my Office of Emergency Services at (805) 654-2552.

Sincerely,



CRAIG HUSBAND  
Undersheriff



## Ventura County Fire Protection District

## MEMORANDUM

DATE: December 9, 2004

TO: Kim Rodriguez, Case Planner

AGENCY: Ventura County Planning Dept.

FROM: John Dodd, Fire Inspector

RMA NUMBER: 04-095

PROJECT: Cabrillo port Liquefied Natural Gas (LNG) Deep Water Port

The following are Ventura County Fire Protection District Comments:

The VCFPD has determined what is deemed necessary for primary and secondary emergency response for the BHP Billiton Cabrillo Port Facility. The intent is that BHP provide adequate resources availability to mount emergency response for their facilities and personnel at no cost burden to the District Taxpayers. VCFPD will request full reimbursement for costs associated with an emergency response to the port, pipeline, and distribution facility. These costs will include equipment, manpower, and associated administrative costs. In addition, VCFPD requests that BHP Billiton fund the following:

L015-37

1) Provide and maintain local fire/rescue boat of appropriate size and equipment configuration as specified by, and for the exclusive use of the Ventura County Fire Dept.

L015-38

2) Fund post positions and training of licensed fireboat operator and crew.

3) Fund post positions for Firefighter/Paramedics for existing fire crews.

4) Fund and support the provisions and training of ocean water rescue response team and equipment as deemed appropriate through emergency response planning.

5) Fund the installation and maintenance of radio transceivers/repeaters on both the FSRU facility and the Ventura County shoreline on Ventura County Fire Department frequencies.

6) Fund the availability of 1 fixed-wing command and control aircraft for exclusive use of Ventura County Fire Department, and the availability of adequate Rescue/Medivac rotary wing aircraft as determined by emergency response planning.

L015-37

Thank you for the information.

L015-38

Section 4.2.4 contains information on responsibilities for public safety. Section 4.2.5.4 contains information on local emergency services funding and cost recovery for incidents.

L015-38  
cont'd

- 7) Fund provisions and maintenance of appropriate Fire and Haz-Mat personnel protective equipment, portable detection equipment, portable monitoring equipment, and appropriate portable radio communications equipment.
- 8) Provide a trained leak control response team from BHP available 24 hours per day, seven days per week.
- 9) Support and fund emergency response planning activities.
- 10) Support, fund, and participate in emergency responder training, Practice drills, and exercises as deemed appropriate by the Ventura County Fire Department.





**Ventura County  
Air Pollution  
Control District**

669 County Square Drive  
Ventura, California 93003

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www.vcapcd.org

**Michael Villegas  
Air Pollution Control Officer**

December 9, 2004

DEC 09 2004

Kim Rodriguez  
Ventura County Planning Division  
800 South Victoria Avenue  
Ventura, CA 93009

**Subject:** Review of Draft Environmental Impact Statement and Environmental Impact Report for the Cabrillo Port Liquefied Natural Gas Deepwater Port, United States Coast Guard (USCG), Maritime Administration (MARAD), and California State Lands Commission (CSLC), Reference No. 04-095

Dear Ms. Rodriguez:

Air Pollution Control District staff has reviewed the subject project draft environmental impact statement and environmental impact report. This is a proposal for construction and operation of an offshore floating storage and regasification unit (FSRU) that would be moored in federal waters offshore of Ventura County. As proposed, the liquefied natural gas (LNG) from the Pacific basin would be delivered by an LNG carrier to, and offloaded onto, the FSRU; regasified; and delivered onshore via two new 21.1-mile, 24-inch diameter natural gas pipelines laid on the ocean floor. These pipelines would come onshore at Ormond Beach near Oxnard to connect through proposed new onshore pipelines to the existing Southern California Gas Company intrastate pipeline system to distribute natural gas throughout the Southern California region. The facilities would be designed to deliver a peak of up to 800 million cubic feet (22.7 million cubic meters) per day. The FSRU would be permanently moored, using a turret system allowing the FSRU to rotate around a fixed point. It would be designed for loading LNG from a side-by-side, moored LNG carrier. Transfer of the LNG from the LNG carriers to the FSRU would occur approximately two to three times per week.

#### Project Location

The FSRU would be located 12.2 nautical miles offshore of the coast of Ventura County in federal waters approximately 2,900 feet deep. The shore connection of offshore pipelines to existing onshore infrastructure would occur at Ormond Beach in the City of Oxnard. Onshore pipelines for transportation of natural gas are located in the Cities of Oxnard and Santa Clarita. The metering station for measurement and transfer of ownership of natural gas would occur near the Reliant Energy Ormond Beach Generating Station in the City of Oxnard. Safety and control valve stations are located on Center Road in unincorporated Ventura County and two locations in Los Angeles County.



General Comments

- |   |         |   |
|---|---------|---|
| 1. Section 4.6, Air Quality, Page 4.6-1, should include a brief summary of the air impact and mitigation conclusions.   | L015-39 | L015-39<br>The Project has been modified since issuance of the October 2004 Draft EIS/EIR. Section 4.6.4 contains revised text on this topic.   |
| 2. All conclusionary statements or findings regarding air quality impacts or mitigation measures should be accompanied by supporting documentation and related material.  | L015-40 | L015-40<br>Appendix G contains supporting documentation and related materials.  |
| 3. Project Area, Page 4.6-1, Line 31, describes the project area and states that the project would be constructed and operated in Ventura and Los Angeles Counties within the geographical jurisdiction of the South Central Coast Air Basin. The FSRU is actually in federal waters just outside the South Central Coast Air Basin and adjacent to Ventura and Los Angeles Counties.   | L015-41 | L015-41<br>Section 4.6.1.2 has been revised in response to the comment.   |
| 4. Page 4.6-2, Line 20, states that Ventura County is nonattainment for the federal ozone standard. In addition, Ventura County also is not in attainment of the California ozone standard.   | L015-42 | L015-42<br>The text in Section 4.6.4 has been revised in response to the comment.   |
| 5. The emissions summaries within Tables 4.6-2 and 4.6-3 should be consistent with those calculated for the project's conformity analysis.  | L015-43 | L015-43<br>The Project construction emission estimates in the General Conformity Analysis (Appendix G4) are consistent with the corresponding emission estimates in Section 4.6.1.3.  |
| 6. Section 4.6-2, Regulatory Setting, Page 4.6-7, also should provide a brief summary of NEPA and CEQA requirements that pertain to the project.  | L015-44 | L015-44<br>Section 1.1.5 discusses this topic.  |
| 7. Section 4.6-3, Significance Criteria, Page 4.6-11, should be revised to include the sources of significance thresholds listed, as well as a discussion of which agency evaluates those impacts.  | L015-45 | L015-45<br>Section 4.6.3 has been updated to include this information.  |
| 8. The Title V Operating Permit (40 CFR 70 and 71) section of Table 4.6-4 – <i>Major Laws, Regulator Requirements, and Plans for Air Quality</i> , (Page 4.6-9) addresses project applicability. We recommend this discussion be revised to state that the major source threshold for reactive organic compounds (ROC) and oxides of nitrogen (NOx) is based on a potential to emit 25 tons per year.   | L015-46 | L015-46<br>The regulatory status of the Project has been modified since issuance of the October 2004 Draft EIS/EIR. Section 4.6.2 contains an updated discussion of relevant regulatory requirements.                                 |
| 9. Section AMM AIR-2a, NOx, CO and VOC Control, Page 4.6-14, Line 21, discusses the dispersion modeling of NOx, CO and VOC Controls. This section should be revised to include a summary of the model's numerical results and documentation to support the finding that model-estimated concentrations were negligible and that in no case would an individual National Ambient Air Quality Standard (NAAQS) for any air pollutant and averaging time be exceeded due to project emissions. | L015-47 | L015-47<br>See the response to Comment L015-46.   |
| 10. Impact AIR-3, Emissions of Ammonia During Offshore Operations, Page 4.6-15, discusses "ammonia slip" during offshore operations. This discussion should   | L015-48 | L015-48<br>Section 4.6.1.3 contains an updated discussion of ammonia emissions from the selective catalytic reduction (SCR) unit. Section 4.6.4 under Impact AIR-8 contains a revised discussion of impacts due to ammonia emissions. |

include the ambient ammonia level expected from the Selective Catalytic Reduction System that will be used to control nitrogen oxide emissions from the FSRU. Moreover the methodology used to estimate ambient ammonia levels should be included as well. It also would be helpful if this section contained a brief description of Selective Catalytic Reduction and how it would reduce FSRU nitrogen oxide emissions.

11. Section 4.6.4.2, Onshore, Page 4.6-17, discusses potential air quality impacts associated with emissions generated by the onshore construction operations. The discussion focuses on ozone precursor emissions and fugitive dust. This section also should address potential human health impacts of diesel emissions from the heavy-duty construction equipment on any nearby populations and potential nuisance impacts (mostly dust and odors) that will be generated by onshore activities.
12. Page 4.6-21, Line 6, states that because methane emissions are not photochemically reactive, they are not regulated by permit or source-specific requirements. The LNG emissions from the project pipeline would not be 100 percent methane; therefore, this statement may not be valid.
13. It is important that all air emission estimates for both the EIR and the conformity analysis be based on the most current applicable emission factors. For example, estimates for on-road emissions should be based on the latest version of EMFAC 2002 rather than EMFAC 2001. EMFAC 2002 can be downloaded from the California Air Resources Board's website at [http://www.arb.ca.gov/msei/on-road/latest\\_version.htm](http://www.arb.ca.gov/msei/on-road/latest_version.htm). Moreover, to the extent feasible, emission estimates for off-road construction equipment should be based on applicable emission factors in the URBEMIS2002 computer program. URBEMIS is a computer program that can be used to estimate emissions associated with land development projects in California, including construction projects. URBEMIS stands for "Urban Emissions Model." URBEMIS 2002 also can be downloaded from the California Air Resources Board website.

#### Project Conformity

1. Section MM AIR-1B, Conformity Analysis, Page 4.6-14, Lines 4-5, state that through implementation of offshore construction emissions reduction measures, the impacts would be less than significant. This section should be expanded to include information to support this finding. Moreover, because several subsections of the air quality section rely on the conclusions of the conformity analysis, the conformity analysis, along with all supporting material and data should be included as a document appendix.

#### L015-49

Section 4.6.4 contains updated information on impacts associated with air pollutants emitted from Project construction equipment.

#### L015-50

Section 4.6.4 has been updated since the issuance of the October 2004 Draft EIS/EIR. Impact AIR-3 discusses this topic.

#### L015-51

Section 4.6.1.3 has been updated using the most appropriate emission factors.

#### L015-52

Section 4.6.4 contains revised information on impacts for offshore construction. A Draft General Conformity Determination was issued in March 2006 with a 30-day public comment period. The Applicant has made commitments to use engines in onshore construction equipment that would comply with the USEPA's Tier 2, 3 or 4 emission standards. This would result in de minimis emissions levels; therefore, MARAD and the USCG have determined that the General Conformity Rule no longer applies and a General Conformity Determination is not required. Section 4.6.2 and Appendix G4 contain additional information on this topic.

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L015-52

2. Although not normally part of the environmental review process, it would be helpful if the discussion of conformity were expanded to include the following: **L015-53**

This project is subject to the requirements of the federal General Conformity rule. On November 23, 1993, a federal rule entitled "Determining Conformity of General Federal Actions to State or Federal Implementation Plans" was published in the Federal Register. This rule, also called "general conformity," states that a federal agency may not "engage in, support in any way or provide financial assistance for, license or permit, or approve any activity which does not conform to an applicable implementation plan." In Ventura County, the applicable implementation plan is the Ventura County Air Quality Management Plan.

#### Project Mitigation

1. Section 4.6.4.1, Offshore, Page 4.6-13, and Section 4.6.4.2, Onshore, Page 4.6-17, should be revised to incorporate a discussion of each project feature and mitigation measure with evidence substantiating the degree to which the project feature and/or mitigation measure would minimize each project air quality impact. For example, AMM AIR-1a, Using Low Emission-Emitting Equipment, and MM AIR-1b, Conformity Analysis, should each include information detailing and substantiating the degree to which they would reduce construction air impacts to a less than significant level. Moreover, the discussion of MM AIR-2b, NSR Offset Requirement, should be expanded to describe emission offsets and how emission offsets would ensure that emissions from project-related stationary sources would be less than significant. **L015-54**
2. Section MM AIR-2b, NSR Offset Requirement, Page 4.6-15, Lines 29-34, discusses permissible exposure limits to protect workers against health effects of exposure to hazardous substances. Please clarify the expected level of worker protection. **L015-55**
3. Section AMM AIR-3a, Limit Ammonia Slip, Page 4.6-16, Line 2, states that ammonia slip in the SCR engine exhaust would be limited to 10 ppm by volume. Please explain how this would occur. **L015-56**
4. Section AMM AIR-4a, Use of New Vessels, Page 4.6-16, discusses the use of new vessels with USEPA-compliant engines for the project. We recommend this section be expanded to include a discussion that provides evidence of this conclusion. **L015-57**
5. Section 4.6.4.2, Onshore, Page 4.6-17, Line 19, states that project construction would cause a minor temporary reduction of local ambient air quality due to emissions generated by the construction equipment and associated vehicles. We **L015-58**

#### **L015-53**

Section 4.6.2 includes an updated discussion of the applicability of the General Conformity rule.

#### **L015-54**

Section 4.6.4 contains a revised discussion of this topic.

#### **L015-55**

The Project is required to comply with all applicable local, state, and federal rules and regulations. Worker safety and protection requirements are administered by OSHA.

#### **L015-56**

EPA has jurisdiction over the operations permit and could include a continuous emissions monitoring system as a condition of the permit, if deemed necessary.

#### **L015-57**

The Project has been modified since issuance of the October 2004 Draft EIS/EIR. See Section 1.4.2 for a summary of Project changes. Tugs and crew vessels would have diesel engines equipped with air pollution control technology that would result in emissions comparable to emissions from natural gas-fueled engines.

#### **L015-58**

See the response to Comment L015-46.



recommend quantification of this reduction of local ambient air quality be included and documented.

6. Mitigation Measure for Impact Air-6, Page 4.6-21, Line 13, discusses mitigation of an accident during offshore operations. Because many people are worried about an offshore accident, we recommend expansion of discussion of Mitigation Measure for Impact Air-6: Emissions from an Accident During Offshore Operations.

L015-59

#### Cumulative Air Quality Impacts

The draft environmental impact statement/report should include a discussion of potential cumulative air quality impacts. The California Environmental Quality Act defines a project as having a cumulative impact if the project's incremental effect, though individually limited, is cumulatively considerable. If the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probably future projects, there is a cumulative effect. This analysis would evaluate the cumulative air quality impacts of the project with relevant and probable future projects producing related or similar environmental effects as the proposed project.

L015-60

If you have any questions, please call Alicia Stratton at 805/645-1426, or Chuck Thomas of my staff at 645-1427.

Sincerely,



Michael Villegas  
 Air Pollution Control Officer

c: Scott Johnson, Manager, Monitoring and Planning Division

L015-59

Impact AIR-3 in Section 4.6.4 contains revised information on impacts from an LNG spill or pipeline rupture.

L015-60

Section 4.20.3 presents a revised discussion of this topic.